

**IN THE UNITED STATES DISTRICT COURT FOR
THE WESTERN DISTRICT OF PENNSYLVANIA**

RENEE ZINSKY,

Plaintiff,

v.

MICHAEL RUSSIN, RUSSIN FINANCIAL,
RUSSIN GROUP,

Defendants.

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)
) Civil Action No. 2:22-cv-547-MJH
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) Electronically Filed
)
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)
) Jury Trial Demanded
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)

JOINT MOTION FOR ENTRY OF PROTECTIVE ORDER

In accordance with the Federal Rules of Civil Procedure, Plaintiff Renee Zinsky, Defendants Michael Russin, Russin Financial, Russin Group (collectively “Defendants”), and non-parties Simon Arias, III, Arias Agencies, and S.A. Arias Holdings, LLC (collectively “Arias”), respectfully move for a protective order limiting the use and dissemination of information that will be exchanged in discovery in this action. In support, the parties and non-party Arias represent as follows:

1. During discovery in this matter, the parties and non-party Arias will produce and/or exchange information that constitutes confidential business and personal information.
2. This information includes, but is not limited to, business records, financial records, and contracting records, all of which require protection against unrestricted disclosure and use.
3. Rule 26(c) provides for the entry of an order protecting a party or person from annoyance, embarrassment, oppression, or undue burden or expense. Fed. R. Civ. P. 26(c).

4. The information the parties and non-party Arias seek to protect is not available to the public, and maintaining its confidentiality is necessary to protect the parties, non-party Arias, and other persons from annoyance and embarrassment.

5. The parties and non-party Arias have stipulated to and request entry by the Court of the Stipulated Protective Order attached to this Motion.

WHEREFORE, the parties and non-party respectfully request that this Court enter the attached Stipulated Protective Order.

Dated: February 10, 2023

Respectfully submitted,

STRASSBURGER McKENNA GUTNICK
& GEFSKY

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